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Hanford Task Force Advisory

USDOE's Solid Waste Environmental Impact Statement May 2003

WPSR's Hanford Task Force is very concerned about the health and safety risks associated with the US Dept. of Energy's 'Accelerated Cleanup' Plan. This Solid Waste EIS is the first major expression of this acceleration for Hanford. Here are some reasons you should raise your voice during the pubic comment period.

- Given that the Hanford Nuclear Reservation is already the most contaminated site in the country, it is too risky to the public health to bring in additional waste to this overburdened site when substantial existing contamination is not contained (e.g. leaking tanks, groundwater, etc.), much less cleaned up. We oppose the import of any new waste to Hanford until the site is in compliance with all federal and state environmental regulations, and until a publicly vetted national strategy for the disposition of all DOE's nuclear wastes is established. The options presented in this EIS do not provide adequate information on the risk of waste streams coming to Hanford.
- The assertion that Hanford must 'do its part' since Hanford waste will be going to the Waste Isolation Pilot Plant (WIPP) in New Mexico and Yucca Mountain in Nevada is grossly misleading. WIPP and Yucca Mountain are clean facilities specifically designed to store radioactive wastes. Hanford is the most contaminated site in the nation. To suggest these three sites are somehow equal as recipients for radioactive waste makes no sense and is insulting to the people of the Northwest.
- The continued use of unlined burial grounds for radioactive waste is unacceptable. We recommend that the use of unlined trenches cease by the end of 2003.
- The monitoring point to assess groundwater contamination from the burial grounds is supposed to be at the waste site boundary. That is the "point of compliance" according to the USEPA. However, USDOE is currently using a monitoring point one kilometer away, which therefore is an inaccurate and misleading measure of groundwater contamination. We recommend installing new wells, as legally required, at the point of compliance.

4554 12th Ave NE, Seattle WA 98105 • Phone: (206) 547-2630 • Fax: (206) 547-2631 • www.wpsr.org

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Many hazardous wastes known to be present in Hanford's low-level burial grounds are not included in USDOE's evaluation. These contaminants include, among others, mercury, beryllium and carbon tetrachloride (known carcinogen). These omissions are irresponsible for health and jurisdictional reasons. The State of Washington regulates mixed wastes but cannot regulate purely radioactive waste. We need the State's help in protecting the people of the Northwest. Better characterization of these mixed wastes is needed.

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The USDOE has not allowed reasonable and sufficient time for the regulators and the public to review and digest this 3,000-page document. Given the enormity of these decisions and the ramifications for decades to come, this document requires thorough and thoughtful review. While technically following required guidelines, refusal to extend the public comment period, despite many requests, demonstrates a lack of good faith in genuinely seeking meaningful outside comments. It is particularly arrogant because it disregards time needed by the Hanford Advisory Board to prepare advice at its June 5-6 meeting. It is not too late to remedy this. We strongly urge USDOE, as a show of good faith, to extend the comment period an additional two weeks to June 10

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 Because of omissions and insufficient evaluations, particularly regarding cumulative impacts, we recommend that this environmental impact statement be rejected and a new, more comprehensive EIS be drafted. JAY INSLEE 1ST DISTRICT, WASHINGTON

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Inslee Statement on Hanford EIS May 15, 2003 21905 64TH AVE. WEST, #101 MOUNTLAKE TERRACE, WA 98043–2278 (425) 640–0233 FAX: (425) 776–7168

17791 FJORD DR., NE, DOOR 112 POULSBO, WA 98370 (360) 598–2342 FAX: (360) 598–3650

308 Cannon House Office Building Washington, DC 20515–4701 (202) 225–6311 Fax: (202) 226–1606

JAY.INSLEE@MAIL.HOUSE.GOV WWW.HOUSE.GOV/INSLEE

I appreciate the opportunity to comment on the Department of Energy's Revised Draft Hanford Site Solid Waste Program Environmental Impact Statement, and I regret that I could not be here in person.

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First of all, I would like to thank the Department of Energy for having this hearing in Seattle today, and recognizing that decisions we make at about managing radioactive wastes at the Hanford site have state-wide implications and draw state-wide concerns. Decisions we make in the Environmental Impact Statement will contribute to the legacy that we leave our children and future generations.

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While progress has been made at the Hanford site, principally with respect to the K-Basin and cocooning of reactors, there is an enormous amount of work yet to be done, and a lot of uncertainty surrounding the future of the site. For these reasons, I have grave concerns about plans to import more wastes into the Hanford site, particularly when those wastes are put in unlined soil trench landfills.

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This Draft EIS fails to clarify one major uncertainty; the date at which the Department of Energy will stop the unacceptable practice of dumping radioactive wastes in unlined soil trenches. I am working with my colleagues in Congress to require the burial of all new radioactive wastes in lined facilities, and I encourage the DOE to implement such a requirement at the earliest date possible.

Lined landfills with leachate collection and monitoring would prevent the leakage and contamination of groundwater that has been documented by Washington State to have occurred at Hanford's Low-Level Burial Grounds while they remain open. This is why all other landfills in our state and nation are required to have liners, leachate collection and monitoring. I believe that the same standard should be met by the U.S. Department of Energy.

Based on press accounts I have seen and statements by DOE officials, it is my understanding that while the Department recognizes the importance of putting all wastes in lined facilities, this Draft EIS does not contemplate doing so until years into the future. I believe this is unacceptable. In today's day and age, there is no reason we should be dumping radioactive wastes in unlined landfills, particularly at Hanford where history has demonstrated that what we put in the ground often ends up in the Columbia River.

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- We all recognize that the greatest threat to the Columbia River is the tank farms, and stabilizing, pumping, and eventually vitrifying and shipping these wastes must remain our top priority. There is no reason, however, why we cannot build lined landfills for other wastes we are burying. Lined landfills are not rocket science. We require them for the burial of municipal household landfills, and we should require it for radioactive wastes.
- In addition to protecting the Columbia River and the public from possible harmful exposure to radiation, insisting on lined facilities will also save taxpayers dollars. There is no question that we will eventually dig up all wastes in unlined soil trenches and transfer them to more stable lined facilities. Making the modest and clearly needed investment now will save taxpayer dollars in the long term.

I would like to thank all those here tonight for continuing to participate in the Hanford cleanup effort and look forward to working with all of you on this important issue.

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Very truly yours,

Jay Inslee

Member of Congress